

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ESTATE OF RUTH FREIWALD, et al.,

Plaintiffs,

v.

Case No. 18-C-896

ADEYEMI FATOKI,

Defendant.

SPECIAL VERDICT

We the jury, for our Special Verdict, answer the questions submitted to us as follows:

Question 1. Was Dr. Fatoki deliberately indifferent to the serious medical needs of Ruth Freiwald in violation of the Eighth Amendment?

ANSWER: Yes _____ No X _____

If you answered "Yes" to Question 1, then answer Questions 2 and 3. If you answered "No" to Question 1, do not answer any other questions.

Question 2. Was Dr. Fatoki's deliberate indifference a cause of Ruth Freiwald pain and suffering before her death?

ANSWER: Yes _____ No _____

Continue to Question 3.

Question 3. Was Dr. Fatoki's deliberate indifference a cause of Ruth Freiwald's death?

ANSWER: Yes _____ No _____

If you answered "yes" to Question 2, then answer this question:

Question 4. What sum of money will reasonably and fairly compensate the Estate of Ruth Freiwald for Ruth Freiwald's physical and mental suffering caused by Dr. Fatoki's deliberate indifference?

ANSWER: \$_____.

If you answered "yes" to Question 3, then answer Questions 5, 6, and 7. If you answered Question 3 "no", do not answer those questions.

Question 5. What sum of money will reasonably and fairly compensate the Estate of Ruth Freiwald for Ruth Freiwald's medical bills?

ANSWER: \$156,372.00.

Continue to Question 6.

Question 6. What sum of money will reasonably and fairly compensate the Estate for Ruth Freiwald's loss of life and the enjoyment thereof?

ANSWER: \$_____.

Continue to Question 7.

Question 7. What sum of money will reasonably and fairly compensate the children of Ruth Freiwald for the loss of society and companionship of their mother?

ANSWER: \$_____.

If you answered either Question 2 or Question 3 "yes", then answer Question 8.

Question 8. Was Dr. Fatoki's deliberate indifference malicious or in reckless disregard of Ruth Freiwald's rights?

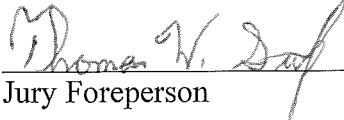
ANSWER: Yes _____ No _____

If you answered Question 8 "yes," then answer Question 9. If you answered Question 8 "no," do not answer any more questions.

Question 9. What amount, if any, do you award as punitive damages against Adeyemi Fatoki?

ANSWER: \$_____.

Dated at Green Bay, Wisconsin this 31 day of August, 2021.



Jury Foreperson